

# **Exhibit B**

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November 24, 2004

Jonathan I. Handler, Esq.  
Day, Berry & Howard, LLP  
260 Franklin St.  
Boston, MA 02110

Re: Richard E. Kaplan v. First Hartford Corporation (C.A. No. 04-10402-NMG)

Dear Jonathan:

With respect to our document request No. 7 in the above case (to which you responded in writing on May 26, 2004), you proposed in an email dated July 7, 2004 to "produce the documents underlying the transactions referenced in the most recent proxy statement."

On July 13, 2004, you produced some documents, but no documents underlying the transactions referenced in the proxy statement. As to those documents, you then said that it was "taking slightly longer than expected to gather" them, but you did "not foresee a significant delay."

Not having received any further documents from you or, in the alternative, an explanation for why 2 months had passed without hearing from you regarding the production of additional documents (despite our having signed your proposed protective order), on September 15, 2004, I sent you an email asking if you had any documents ready to produce. You failed to respond to my email of September 15, so on September 21 I called you and asked about the production of additional documents. On September 21 you told me that you had documents "stamped" and ready to produce, but you insisted that I send you a letter reiterating what I had already said in my September 15 email: that we would abide by the protective order even if that order was not endorsed by the Court. The letter you asked for was faxed to you on September 22. Again, not having heard from you and not having received any additional documents, on September 28 I sent you a letter and asked once more when you would be producing the documents that we had been discussing since mid-July, 2004.

On September 29, 2004, you produced 7 documents in response to our document request No. 7. On October 5, I sent you an email and asked whether those 7 documents were the entirety

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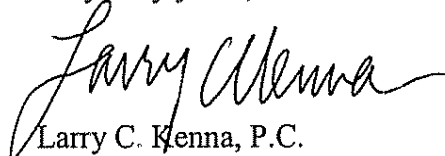
of the documents you intended to produce in response to our document request No. 7; as I pointed out to you then, the 7 documents did not appear to include anything related to many of the transactions referenced in the proxy materials at pages 7-8, such as "the stock pledges to Neil Ellis, the cash advances made to Ellis' companies, the loans referred to on page 8, etc."

On October 13, 2004, when we met at your offices, one of the topics we discussed was the production of additional documents in response to our document request No. 7. You told me then that you (or your client) was looking for the documents, but had not found any as of the last time you checked. When I reminded you by email dated October 19 that we were patiently waiting to hear from you regarding the documents, you responded that it was your understanding "that we believe there are additional responsive documents, but we have not yet been able to locate them." You said that you expected "a further update later [during the week of October 18-22]" and that you would let me know what you learned.

I have heard nothing from you on this subject since your email of October 19. Another entire month has passed without any production of documents or any further explanation for the delay.

Would you mind explaining to me what is going on? When can we expect the production of the additional documents?

Very truly yours,



Larry C. Kenna, P.C.

cc: Robert Rothberg, Esq.  
Richard Kaplan, Esq.